

## BOIES SCHILLER &amp; FLEXNER LLP

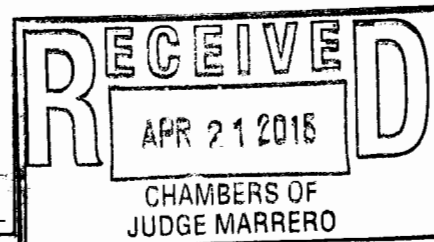
575 LEXINGTON AVENUE • 7TH FLOOR • NEW YORK, NY 10022 • PH. 212.446.2300 • FAX 212.446.2350

April 21, 2015

**BY FAX**

The Honorable Victor Marrero  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 4/22/15



Re: *Anwar, et al. v. Fairfield Greenwich Limited, et al.*  
Master File No. 09-CV-00118 (VM) (FM)

Dear Judge Marrero:

We write on behalf of all parties in the above-referenced action in response to the Court's request at the conference on April 14, 2015 to submit a proposed trial and mediation schedule. The parties have met and conferred in good faith and agreed upon the following schedule:

- June 18, 2015: Parties to participate in mediation by this date; the parties have scheduled a mediation on June 17 before Hon. Layn Phillips.
- September 1, 2015: Parties to file any summary judgment motions by this date, or a party may defer, without prejudice, the filing of its summary judgment motion (or Rule 50 motion) until the close of the opposing parties' case-in-chief. Under either procedure, no response to any such motions shall be filed pending further instruction of the Court, which may not rule on such motions prior to trial. Defendants object to the foregoing procedure, and reserve the right to seek reconsideration.
- September 1, 2015: Plaintiffs provide defendants with draft pre-trial submissions, including designations of depositions.<sup>1</sup>
- September 15, 2015: Parties to file any *Daubert* motions, with responses due 30 days thereafter and replies 15 days thereafter.
- October 1, 2015: Defendants provide plaintiffs with draft pre-trial submissions, including designations of depositions.

<sup>1</sup> The Court's standing Trial Procedures shall govern the parties' pre-trial submissions.

## BOIES, SCHILLER &amp; FLEXNER LLP

The Honorable Victor Marrero

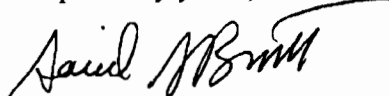
April 21, 2015

Page 2

- November 2, 2015: Parties to file final pre-trial joint submissions in accordance with Court's standing trial procedures, together with objections to designated deposition testimony. Parties to file motions *in limine*, with responses due 14 days thereafter and replies 7 days thereafter.
- December 1, 2015: Case ready for Final Pre-Trial Conference.
- January 4, 2015: Jury trial of 6 weeks commences. Plaintiffs believe the trial can be concluded in 4-6 weeks. Defendants believe the trial will require 8-12 weeks.

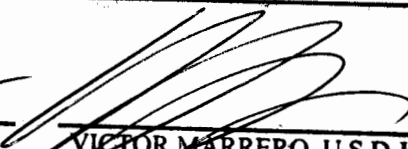
The parties are available to discuss these matters at the Court's convenience or otherwise to provide further information.

Respectfully yours,



David A. Barrett

CC: All Anwar counsel (by e-mail)

The Clerk of Court is directed to enter into the public record of this action the letter above submitted to the Court by <u>the parties</u>	
SO ORDERED.	
<u>4-21-15</u> DATE	 VICTOR MARRERO, U.S.D.J.